



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 5, 2011

Joyce M. Stille, Administrative Officer
Town of Bolton
222 Bolton Center Road
Bolton, Connecticut 06043

Re: Comments on PCB Self-Implementing On-Site Cleanup and Disposal Plan for PCB-Containing Interior/Exterior Window and Soffit Caulk, March 8, 2011
Bolton High School

Dear Ms. Stille:

The US Environmental Protection Agency - New England (EPA) has received a Notification dated March 8, 2011 to address PCB contamination at the Bolton High School (BHS), 72 Brandy Street, Bolton, Connecticut (the Site). Specifically, the Notification indicates that non-liquid PCBs (i.e. caulk) and PCB-contaminated building substrates (i.e. *PCB remediation waste*) are present at the Site, which require cleanup under the federal PCB regulations at 40 CFR Part 761.

EPA has reviewed your Notification and **has determined that it is incomplete and does not meet the notification requirements at 40 CFR § 761.61(a)(3)**. Specific comments follow:

1. The Town of Bolton previously conducted abatement work inside the BHS under an EPA approval dated August 2, 2010. The work was conducted to address PCB caulk that was located along interior metals beams and included the following activities:
 - Removal and disposal of PCB caulk with greater than or equal to (\geq) 50 ppm;
 - Decontamination of *non-porous surfaces* (i.e. metal beams) in contact with the \geq 50 ppm PCB caulk to less than or equal to (\leq) 10 $\mu\text{g}/100\text{ cm}^2$ PCBs; and,
 - Removal and disposal of PCB-contaminated *porous surfaces* (i.e. concrete) with greater than ($>$) 1 ppm;

It would be helpful if the figures could show the walls where previous abatement work has been conducted. Of particular interest are the common interior walls (walls between rooms). PCBs at > 1 ppm have been found in what appear to be close proximity to the common interior walls, such as W02 and W06. As the figures are not to scale, it is important to clarify why/if there is potential that any of the interior walls could be contaminated with PCBs.

2. Page 1, Section 1 – The work plan indicates that the PCB remediation and disposal project will be undertaken in 2 distinct areas, specifically to include the exterior windows and soffit covering for W16 through 25 and W26 through 39. Analytical data indicates that the interior walls and exterior walls are also PCB contaminated, thus it is unclear why these walls are not included as part of the PCB project activities.
3. Page 3, Section 2.1 and Table 2.1.1 – Sample # JW15 is indicated as a “C” façade composite sample. Please note that Figure PCB-S-2 also indicates that this caulk is associated with the “C” Façade. However, a review of the chain of custody indicates that this sample is “Exterior Tectum Deck Caulk”. Please clarify what this sample actually represents.
4. Page 4 – The first paragraph, last sentence states “Sample of the “infill” cmu blocks between the windows did not detect any PCB”. Please clarify which samples represent the “infill” cmu blocks.
5. Page 5. Section 2.2.1. 2nd paragraph. The range for PCBs in the exterior window frame caulk should be ND to 2,000 ppm according to the Table 2.1.1.
6. Figure PCB-C-1. Based on EPA’s review of this figure and Table 2.1.3, EPA believes that the sample labels representing locations W15-E1-B and W15-E2-B are incorrect. Please confirm and amend as necessary for accuracy.
7. Pages 6 and 7 – Please define what is meant by a “course” for both cmu and brick sampling. For example, what is the 1st course sample distance from the caulk joint, what is the 2nd course sample distance from the caulk joint, etc? This should be specified for both the cmu concrete block and the brick.
8. Page 7 – For the 7th course of cmu, the text indicates that there were no cmu blocks that exceeded 1 ppm. However, Table 2.1.2 shows 2 areas exceeding the 1 ppm PCB standard, specifically Window 02 and Window 06.
9. Page 7, Section 2.2.3 – The PCB-contaminated bricks would meet the definition of a *PCB Remediation Waste* and not a *PCB Bulk Product Waste*.
10. Pages 9 and 10- The overall project is described as work to be conducted while school is in session versus work that will be completed in the summer.
 - a. Based on information provided via e-mail dated March 25, 2011, EPA now understands that the proposed PCB abatement work will be conducted during school hours. Thus, it is important to understand the controls and monitoring that will be conducted during the “in school session” activities. Please see subsequent comments on containment details and air monitoring.
 - b. Is there a plan available that describes what specific activities will be occurring during school session versus summer break?

- c. Please note marking requirements are found at § 761.40 and § 761.45.
 - d. There is discussion of work to be conducted in the summer; but the first paragraph under Item 2, page 10 discusses construction during April break. Please clarify.
 - e. It is unclear why the work area will be enclosed with a chain link fence during “in school session” work versus a yellow barrier/caution tape during summer work. The work area should be secured within a chain link fence as a yellow barrier/caution tape is not a deterrent to site access.
11. Page 11, Section 3.2.1. Please note that the marking requirements are specified at §§ 761.40 and 761.45. The storage requirements are found at § 761.65.
12. Pages 11/12, Section 3.2.2, PCB Bulk Remediation Waste Materials
- a. Please clarify why the exterior soffit caulk is a PCB Bulk Remediation Waste. EPA assumes the BPS is proposing to disposal of the exterior soffit caulk with the < 50 ppm PCB-contaminated cmu concrete blocks and exterior bricks to streamline waste handling and disposal. However, clarification is requested.
 - b. There is no mention about disposal/decontamination of the windows and/or door frames that are adjacent to the PCB caulk. Please clarify how these types of wastes will be either disposed of or decontaminated. If the metal frames are being decontaminated, this discussion should be included in Section 3.3.
 - c. There is indication that cmu blocks and bricks will be placed in poly disposal bags and then when full, these bags will be placed into disposal containers. Is it feasible to store these types of wastes in poly bags and then move to storage trailers/disposal containers?
 - d. Please review and correct inaccurate regulatory citations, specifically:
 - i) PCB marking requirements are found at §§ 761.40 and § 761.45;
 - ii) PCB liquid waste must be disposed of in accordance with § 761.61(a)(5)(iv);
 - iii) PCB wastes must be stored for disposal in accordance with § 761.65.
 - e. The work plan needs to be more specific on the wastes that will be generated during the project and how they will be disposed of. For example, the plan is unclear on the brick that will be removed (see next comment); on the caulk that will be removed (e.g. it is unclear if all soffit caulk will be removed, etc.) Further, clarification is needed on which wastes will be disposed of as a *PCB bulk product waste*; a *PCB remediation waste* ≥ 50 ppm; and a *PCB remediation waste* > 1 but < 50 ppm. There appears to be reference to disposal of cmu concrete block and brick as a < 50 ppm PCB remediation waste. However, as indicated in Table 2.1.3, PCBs were found at ≥ 50 ppm in exterior brick. A table showing the various waste streams, quantities, and disposal classification may be helpful.

- f. With respect to the preceding comment, please note that Item 1 of this section indicates that Tectum panel and associated brick do not need to be removed. However, Section 3.3.2 indicates that **all** exterior brick walls will be removed as PCB Bulk Remediation Waste. Thus, the wastes that will be removed and disposed of needs to be clarified in the plan.

13. Section 3.3 – Verification Sampling Plan

- a. Section 3.3.1 indicates that interior floor wipe samples will be collected following abatement activities. Given the proposed demolition of entire walls, EPA would also recommend random wipe sampling of interior walls to confirm that PCB concentrations are $< 1 \mu\text{g}/100 \text{ cm}^2$. EPA recommends that prior to wipe sampling, HEPA vacuuming be conducted of **all** remaining interior surfaces located within containment.
- b. Section 3.3.1 – It is unclear how the 20 linear feet frequency will be established for interior floor surfaces. Please clarify how this will be conducted.
- c. Section 3.3.1 – More details on the air monitoring are required. Specifics regarding air sampling methods, numbers of samples, frequency, sampling locations, air action levels, and laboratory reporting limits are requested. This is important given that the proposed PCB work will be conducted during school hours.

14. Figure PCB-S-2. It is unclear why samples JW15; PCB3; JW05 (1/7) and JW06 (1/7) were not shown on the figure.

15. Table 2.1.1 – Sample JW05 caulk was found to have a PCB concentration of 22,000 ppm. This result was the highest identified in a caulk sample. As noted in the previous comment, as the sample location was not shown on the figure, EPA cannot ascertain where it is located and if any sampling was conducted on the adjacent surfaces. If sampling was conducted on the adjacent surfaces, please provide the associated sample numbers and PCB analytical results.

16. EPA has reviewed the PCB analytical data provided in Appendices A-D.

- a. The analytical reports are stamped “Draft Progress Report” and it indicates in the laboratory notes that the data is to be considered preliminary data.
 - i) Have final laboratory reports been provided by the laboratory? If so, a copy of the final reports should be provided to EPA. These reports may be provided on a CD rather than in hard copy.
 - ii) EPA notes that two (2) different Aroclors were identified by the laboratory. The caulk was found to have Aroclor 1254; however, the adjacent substrates were found to have Aroclor 1254 or Aroclor 1260. Aroclor 1260 was generally found several courses away from the caulk. Is there any reason as to why 2 different Aroclors may

be present? Is there potentially another source present or previously present that could be a factor? Otherwise, please verify with the laboratory that Aroclor 1260 is correctly reported.

- iii) With exception of reported surrogate recoveries, no laboratory QA/QC information is included in the reports, such as method blanks, laboratory duplicates, MS/MSDs, etc. EPA assumes that the laboratory has a QA/QC program. Thus, the QA/QC information should be included to support the validity of the reported results.

17. Appendix E – Technical Specifications

a. Section 1.1

- i) It is indicated that PCB-containing caulk at > 1 ppm but < 50 ppm was identified on the exterior soffit. Table 2.1.1 does not confirm this statement. Please clarify where the > 1 ppm PCB exterior soffit caulk is located.
- ii) It is indicated that PCB-containing caulk with > 50 ppm is located on interior/exterior window frames in the 1963 structure. Please note that there is reference to door frame caulk on Figures PCB-S-1 through PCB-S-3. If the caulk is only located around windows, the figures should be corrected for accuracy.

b. Section 1.3

- i) Please be aware that EPA will require submittal of a contractor work plan detailing means/methods of removal, waste handling/storage/disposal information, and decontamination information.
- ii) Page 13 of the BPS work plan indicates that Eagle Environmental plans to collect limited background air samples. Please clarify if Eagle will actually collect the samples, or if it will be the responsibility of the contractor. If it is the contractor, details on air monitoring will need to be included in the contractor work plan. Otherwise, more details on the air monitoring will need to be incorporated into the BPS work plan (see Comment 13, above).

c. Section 3.1

- i) This section describes the containment that will be employed during removal of caulk. However, given that that entire walls and a large portion of exterior walls will be removed, it is unclear how containment will be implemented and how negative air requirements will be maintained.

d. Sections 3.3 and 3.4

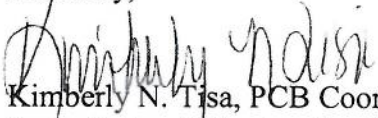
- i) The technical specifications do not contain information on where the various PCB waste streams will be disposed of, including the liquid decontamination wastes. Thus, as noted previously, this will need to be included in the contractor work plan.
- ii) Please note that a PCB transporter must have notified EPA and obtained a valid EPA ID number as a PCB transporter.

18. The certification is signed by the Town of Bolton, but the cover page appears to indicate that the work is being conducted on behalf of the Bolton Public Schools. It is unclear how these two entities are related. Thus, please confirm that the Town of Bolton will be the party responsible for the proposed PCB abatement activities.

19. As was previously required, community outreach will be necessary on this project. Please clarify what, if any, information has been provided to the school community on this proposed work.

Should you have any questions regarding the above or questions on the PCB regulations at 40 CFR Part 761, please feel free to call me at (617) 918-1527.

Sincerely,



Kimberly N. Tisa, PCB Coordinator (OSRR07-2)

Remediation & Restoration II Branch/RCRA Corrective Action Section

cc: A. Roychowdhury, Eagle Environmental
Gary Trombly, CTDEP
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